

BLANKROME

444 West Lake Street | Suite 1650 | Chicago, IL 60606

Phone: (312) 776-2517

Fax: (312) 276-2601

Email: Daniel.saeedi@blankrome.com

April 11, 2025

VIA ECF

The Honorable Phillip M. Halpern
United States District Court for the Southern District of New York
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: *DB Home Designs, LLC v. Matthew Wilhelm et al.*
Case No. 7:23-cv-11307

We write on behalf of the Plaintiff in the above-captioned case, DB Home Designs, LLC ("Plaintiff"), pursuant to Rules 1B and 5B of Your Honor's Individual Practices order.

Plaintiff respectfully requests that this Court maintain under seal the documents that Plaintiff has filed simultaneous to this letter-motion under seal, which are Exhibits D and G to Plaintiff's contemporaneously filed Motion in Limine.

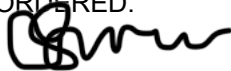
To be approved, any redaction or sealing of a court filing must be narrowly tailored to serve whatever purpose justifies the redaction or sealing and must be otherwise consistent with the presumption in favor of public access to judicial documents. *See, e.g., Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). In general, the parties' consent or the fact that information is subject to a confidentiality agreement between litigants is not, by itself, a valid basis to overcome the presumption in favor of public access to judicial documents. *See, e.g., In re Gen. Motors LLC Ignition Switch Litig.*, 2015 WL 4750774, at *4 (S.D.N.Y. Aug. 11, 2015).

This is a trade secret case that fundamentally involves the most sensitive of business

Application denied without prejudice. Exhibits D and G are not entitled to wholesale sealing. Plaintiff's letter motion (Doc. 80) fails to set forth on a particularized basis both the justification for the sealing of such documents, and that such sealing would be sufficiently narrowly tailored to safeguard the alleged confidential information. Plaintiff is referred to Rule 5(B) of this Court's Individual Practices, which includes directives on the filing of proposed sealed documents under seal and/or redacted only to the extent necessary to safeguard information sought to be filed under seal. Counsel is also referred to paragraph 10 of the Stipulated Confidentiality Agreement and Protective Order (Doc. 43).

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 80.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 17, 2025

a protective order that allows the
" (ECF No. 43). Exhibits D and G
protected in these exhibits includes
side of Plaintiff's business. Such
customer names, file names, and
y requests that the Court maintain

Respectfully submitted,

/s/ Daniel R. Saeedi

BLANK ROME LLP